

K090301

## 510(k) SUMMARY

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This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92.

The assigned 510(k) number is: k090301

### SUBMITTER

Binax, Inc.  
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Establishment Registration Number: 1221359

APR 14 2010

### CONTACT PERSON

Suzanne M. Vogel  
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### DATE PREPARED

April 12th, 2010

### TRADE NAME

BinaxNOW® PBP2a Test

### COMMON NAME

BinaxNOW® PBP2a Test, BinaxNOW® PBP2a, Binax NOW® PBP2a Test, Binax NOW® PBP2a, NOW® PBP2a Test, NOW® PBP2a

### CLASSIFICATION NAME

System, Test, Genotypic Detection, Resistant Markers, Staphylococcus Colonies (MYI) (per 21 CFR 866.1640)

### PREDICATE DEVICES

Mueller Hinton Agar w/4% NaCl w/Antibiotics (Remel) K850291  
PBP2<sup>+</sup> Latex Agglutination Test (Oxoid) K011710

### DEVICE DESCRIPTION

The BinaxNOW® PBP2a Test is a rapid immunochromatographic membrane assay that uses highly sensitive monoclonal antibodies to detect the PBP2a protein directly from blood cultures which have been identified as being positive for *S. aureus*. These antibodies and a control antibody are immobilized onto a test strip as two distinct lines and combined with other reagents/pads. This test strip is mounted inside a cardboard, book-shaped hinged test device.

Specimens are aliquots from blood cultures which have been identified as positive for *Staphylococcus aureus*. After the sample is prepared, it is added to the sample pad at the top of the test strip and the device is closed. Results are read at 10 minutes.

## INTENDED USE

The BinaxNOW® PBP2a Test is a qualitative, *in vitro* immunochromatographic assay for the rapid detection of penicillin-binding protein 2a (PBP2a) present in methicillin-resistant *Staphylococcus aureus* (MRSA). The test is performed directly on blood culture samples positive for *S. aureus*.

The BinaxNOW® PBP2a Test is not intended to diagnose MRSA nor to guide or monitor treatment for MRSA infections. Subculturing positive blood cultures is necessary to recover organisms for susceptibility testing or epidemiological typing.

## Performance Characteristics

### Clinical Performance

The clinical performance of the BinaxNOW® PBP2a Test was established in a multi-center clinical study conducted in 2008-09 at four geographically diverse hospital laboratories within the US.

A total of 199 *S. aureus* samples were evaluated in the BinaxNOW® PBP2a Test and compared to standard methods used routinely by the laboratories: Cefoxitin (30 µg) disc diffusion, Oxacillin (1 µg) disc diffusion, and automated Minimum Inhibitory Concentration (MIC) Systems. Individual samples were evaluated by multiple laboratory methods, and in all cases there was 100% agreement between the reference methods. Among the clinical samples tested, only three clinical samples (3/199 or 1.5%) produced discrepant results. Overall, the BinaxNOW® PBP2a assay identified 97.1% of the specimens positive for MRSA and 100.0% of the specimens negative for MRSA.

The table below presents BinaxNOW® PBP2a Test performance by reference method. Because each sample was tested on more than one reference method, there are more observations in this table (n=317) than the total number of samples (n=199).

### BinaxNOW® PBP2a Test Performance vs. Reference Methods

Reference Method	Positive Agreement (95% CI)	Negative Agreement (95% CI)
Cefoxitin (30 µg) disc diffusion	96.9% (62/64) (89.3 - 99.1%)	100.0% (67/67) (94.6 - 100.0%)
Oxacillin (1 µg) disc diffusion	96.5% (55/57) (88.1 - 99.0%)	100.0% (58/58) (93.8 - 100.0%)
Automated Antimicrobial Susceptibility Test System	97.6% (41/42) (87.7 - 99.6%)	100.0% (29/29) (88.3 - 100.0%)

### Expected Values

In the clinical evaluation of the BinaxNOW® PBP2a Test conducted in 2008-09 at four geographically diverse hospital laboratories within the US, the overall expected rate of PBP2a (MRSA) was 51.3% (102/199), and among the four site populations the expected positive rate ranged from 48.3% to 61.5%.

### Analytical Reactivity

The human pathogenic Network on Antimicrobial Resistance in *Staphylococcus aureus* (NARSA) and American Type Culture Collection (ATCC) methicillin-resistant *Staphylococcus aureus* (MRSA) strains listed below tested positive in the BinaxNOW® PBP2a Test as expected.

### Methicillin-Resistant *Staphylococcus aureus* (MRSA)

Bacterium	Bacterium
<i>Staphylococcus aureus</i> ATCC 33591	<i>Staphylococcus aureus</i> NRS643(USA300)
<i>Staphylococcus aureus</i> ATCC 33592	<i>Staphylococcus aureus</i> NRS647(USA300)
<i>Staphylococcus aureus</i> ATCC 43300	<i>Staphylococcus aureus</i> NRS657(USA300)
<i>Staphylococcus aureus</i> ATCC 49476	<i>Staphylococcus aureus</i> NRS658(USA100)
<i>Staphylococcus aureus</i> ATCC 51153	<i>Staphylococcus aureus</i> NRS659(USA300)
<i>Staphylococcus aureus</i> ATCC 700698	<i>Staphylococcus aureus</i> NRS660(USA100)
<i>Staphylococcus aureus</i> ATCC 700699	<i>Staphylococcus aureus</i> NRS661(USA100)
<i>Staphylococcus aureus</i> ATCC 700789	<i>Staphylococcus aureus</i> NRS667(USA300)
<i>Staphylococcus aureus</i> ATCC BAA1026	<i>Staphylococcus aureus</i> NRS670(USA100)
<i>Staphylococcus aureus</i> ATCC BAA38	<i>Staphylococcus aureus</i> NRS671(USA100)
<i>Staphylococcus aureus</i> ATCC BAA39	<i>Staphylococcus aureus</i> NRS672(USA100)
<i>Staphylococcus aureus</i> ATCC BAA41	<i>Staphylococcus aureus</i> NRS673(USA100)
<i>Staphylococcus aureus</i> ATCC BAA43	<i>Staphylococcus aureus</i> NRS674(USA100)
<i>Staphylococcus aureus</i> ATCC BAA44	<i>Staphylococcus aureus</i> NRS679(USA100)
<i>Staphylococcus aureus</i> NRS123(USA 400)	<i>Staphylococcus aureus</i> NRS687(USA300)
<i>Staphylococcus aureus</i> NRS172	<i>Staphylococcus aureus</i> NRS688(USA300)
<i>Staphylococcus aureus</i> NRS192	<i>Staphylococcus aureus</i> NRS693(USA300)
<i>Staphylococcus aureus</i> NRS193	<i>Staphylococcus aureus</i> NRS694(USA300)
<i>Staphylococcus aureus</i> NRS194	<i>Staphylococcus aureus</i> NRS697(USA100)
<i>Staphylococcus aureus</i> NRS22(USA 600)	<i>Staphylococcus aureus</i> NRS699(USA100)
<i>Staphylococcus aureus</i> NRS241	<i>Staphylococcus aureus</i> NRS710(USA100)
<i>Staphylococcus aureus</i> NRS245	<i>Staphylococcus aureus</i> NRS711(USA100)
<i>Staphylococcus aureus</i> NRS248	<i>Staphylococcus aureus</i> NRS716(USA300)
<i>Staphylococcus aureus</i> NRS249	<i>Staphylococcus aureus</i> NRS717(USA100)
<i>Staphylococcus aureus</i> NRS382(USA 100)	<i>Staphylococcus aureus</i> NRS721(USA100)
<i>Staphylococcus aureus</i> NRS383(USA 200)	<i>Staphylococcus aureus</i> NRS725(USA300)
<i>Staphylococcus aureus</i> NRS384(USA 300)	<i>Staphylococcus aureus</i> NRS732(USA300)
<i>Staphylococcus aureus</i> NRS385(USA 500)	<i>Staphylococcus aureus</i> NRS733(USA300)
<i>Staphylococcus aureus</i> NRS386(USA 700)	<i>Staphylococcus aureus</i> NRS736(USA300)
<i>Staphylococcus aureus</i> NRS387(USA 800)	<i>Staphylococcus aureus</i> NRS739(USA300)

### Analytical Specificity (Cross-Reactivity)

To determine the analytical specificity of the BinaxNOW® PBP2a Test, methicillin-susceptible *Staphylococcus aureus* (MSSA), Staphylococcal strains (other than *S. aureus*) and non-Staphylococcal strains were tested. All strains tested negative in the BinaxNOW® test except *Cryptococcus neoformans* and *Staphylococcus sciuri*.

### Methicillin-Sensitive *Staphylococcus aureus* (MSSA)

Bacterium	Bacterium
<i>Staphylococcus aureus</i> ATCC 33862	<i>Staphylococcus aureus</i> NRS167
<i>Staphylococcus aureus</i> ATCC 13150	<i>Staphylococcus aureus</i> NRS168
<i>Staphylococcus aureus</i> ATCC 11632	<i>Staphylococcus aureus</i> NRS169
<i>Staphylococcus aureus</i> ATCC 14776	<i>Staphylococcus aureus</i> NRS170
<i>Staphylococcus aureus</i> ATCC 6538P	<i>Staphylococcus aureus</i> NRS171
<i>Staphylococcus aureus</i> ATCC 29213	<i>Staphylococcus aureus</i> NRS173
<i>Staphylococcus aureus</i> ATCC BAA977	<i>Staphylococcus aureus</i> NRS174
<i>Staphylococcus aureus</i> NRS164	<i>Staphylococcus aureus</i> NRS175
<i>Staphylococcus aureus</i> NRS165	<i>Staphylococcus aureus</i> NRS176
<i>Staphylococcus aureus</i> NRS166	<i>Staphylococcus aureus</i> NRS177
<i>Staphylococcus aureus</i> ATCC 9144	<i>Staphylococcus aureus</i> Lafferty
<i>Staphylococcus aureus</i> ATCC 51740	<i>Staphylococcus aureus</i> ATCC 31153
<i>Staphylococcus aureus</i> ATCC 29737	<i>Staphylococcus aureus</i> ATCC 12600
<i>Staphylococcus aureus</i> ATCC 15564	<i>Staphylococcus aureus</i> ATCC14993
<i>Staphylococcus aureus</i> ATCC 14775	<i>Staphylococcus aureus</i> ATCC 33862
<i>Staphylococcus aureus</i> ATCC 25923	<i>Staphylococcus aureus</i> subsp. <i>Anaerobius</i> ATCC 35844

### Staphylococcal Strains (other than *S. aureus*)

Bacterium	ATCC#	Bacterium	ATCC#
<i>Staphylococcus simulans</i>	27851	<i>Staphylococcus equorum</i>	43958
<i>Staphylococcus warneri</i>	49454	<i>Staphylococcus lentus</i>	700403
<i>Staphylococcus lugdunensis</i>	43809	<i>Staphylococcus hyicus</i>	11249
<i>Staphylococcus sciuri</i>	29601	<i>Staphylococcus carnosus</i>	51365
<i>Staphylococcus saprophyticus</i>	15305	<i>Staphylococcus capitis</i>	35661
<i>Staphylococcus schleiferi</i>	43808	<i>Staphylococcus arlettae</i>	43957
<i>Staphylococcus haemolyticus</i>	29970	<i>Staphylococcus piscifermentans</i>	51136
<i>Staphylococcus kloosii</i>	43959	<i>Staphylococcus hominis</i>	27844
<i>Staphylococcus cohnii</i>	29972	<i>Staphylococcus caprae</i>	51548
<i>Staphylococcus xylosus</i>	49148	<i>Staphylococcus pasteurii</i>	51128
<i>Staphylococcus succinus</i>	700337	<i>Staphylococcus chromogenes</i>	43764
<i>Staphylococcus vitulinus</i>	51162	<i>Staphylococcus lutrae</i>	700373
<i>Staphylococcus pulvereri</i>	51698	<i>Staphylococcus muscae</i>	49910
<i>Staphylococcus intermedius</i>	29663	<i>Staphylococcus felis</i>	49168
<i>Staphylococcus gallinarum</i>	700401	<i>Staphylococcus auricularis</i>	33753
<i>Staphylococcus epidermidis</i>	14990	<i>Staphylococcus delphini</i>	49171
<i>Staphylococcus epidermidis</i>	12228	<i>Staphylococcus saccharolyticus</i>	14953
<i>Staphylococcus epidermidis</i>	35984	<i>Staphylococcus schleiferi</i> subsp. <i>coagulans</i>	49545
<i>Staphylococcus fleurettii</i>	BAA-274	<i>Staphylococcus pseudintermedius</i>	49444

### Non- Staphylococcal Strains

Bacterium	ATCC#	Bacterium	ATCC#
<i>Acinetobacter calcoaceticus</i>	51432	<i>Macrococcus caseolyticus</i>	35662
<i>Aerococcus viridans</i>	10400	<i>Macrococcus equiperdus</i>	51831
<i>Aeromonas hydrophila</i>	35654	<i>Micrococcus luteus</i>	27141
<i>Bacillus cereus</i>	11778	<i>Moraxella catarrhalis</i>	25238
<i>Bacillus subtilis</i>	6633	<i>Morganella morganii</i>	25830-T
<i>Bacteroides fragilis</i>	23745	<i>Neisseria gonorrhoeae</i>	49226
Beta Strep Group F	12392	<i>Neisseria meningitidis</i> , serogroup A	13077
<i>Burkholderia cepacia</i>	25416-T	<i>Neisseria sicca</i>	9913
<i>Candida parapsilosis</i>	90018	<i>Parvimonas micra</i> (formerly <i>Peptostreptococcus micros</i> )	33270
<i>Candida krusei</i>	14243	<i>Pasturella multocida</i>	51687
<i>Cellulomonas turbata</i> (formerly <i>Oerskovia</i> )	25835	<i>Pediococcus acidilactici</i>	12697
<i>Citrobacter freundii</i>	8090	<i>Peptostreptococcus anaerobius</i>	27337
<i>Citrobacter koseri</i>	25408	<i>Planococcus citreus</i>	14404
<i>Clostridium perfringens</i>	3624	<i>Proteus mirabilis</i>	7002
<i>Corynebacterium xerosis</i>	7711	<i>Proteus vulgaris</i>	33420
<i>Corynebacterium amycolatum</i>	49368	<i>Providencia stuartii</i>	49809
<i>Corynebacterium diphtheriae</i>	13812	<i>Pseudomonas aeruginosa</i>	15442
<i>Corynebacterium glutamicum</i>	13869	<i>Pseudomonas fluorescens</i>	49271
<i>Corynebacterium jeikeium</i>	43734	<i>Pseudomonas putida</i>	49128
<i>Corynebacterium pseudodiphtheriticum</i>	10700-T	<i>Rhodococcus equi</i>	10146
<i>Corynebacterium urealyticum</i>	43042	<i>Rothia mucilaginosa</i> ( <i>Stomatococcus</i> )	25296
<i>Cryptococcus neoformans</i>	14116	<i>Salmonella adelaide</i>	10718
<i>Escherichia coli</i> (ESBL producer)	Clinical isolate	<i>Serratia marcescens</i>	13880
<i>Enterobacter aerogenes</i>	35029	<i>Stenotrophomonas maltophilia</i>	12637-T
<i>Enterobacter cloacae</i>	49141	<i>Streptococcus agalactiae</i> , group B	13813
<i>Enterococcus avium</i>	49465	<i>Streptococcus anginosus</i> ( <i>milleri</i> )	33397
<i>Enterococcus casseliflavus</i>	12817	<i>Streptococcus dysgalactiae</i> , group C (strain C74)	12388
<i>Enterococcus durans</i>	49135	<i>Streptococcus dysgalactiae</i> , group G (strain Lf D166B)	12394
<i>Enterococcus faecalis</i>	49474	<i>Streptococcus intermedius</i> ( <i>milleri</i> )	27335
<i>Enterococcus faecium</i>	12952	<i>Streptococcus mitis</i>	49456
<i>Enterococcus gallinarum</i>	49608	<i>Streptococcus mutans</i>	25175
<i>Enterococcus hirae</i>	10541	<i>Streptococcus pasteurianus</i> ( <i>bovis</i> )	49133
<i>Enterococcus mundtii</i>	43187	<i>Streptococcus pneumoniae</i>	33400
<i>Enterococcus raffinosus</i>	49464	<i>Streptococcus pneumoniae</i>	49136
<i>Escherichia coli</i>	10798	<i>Streptococcus pneumoniae</i>	SSI-1
<i>Finlandia magna</i> (formerly <i>Peptostreptococcus magnus</i> )	15794	<i>Streptococcus pneumoniae</i>	SSI-10A
<i>Gemella bergeri</i>	700627	<i>Streptococcus pneumoniae</i>	6301

<i>Haemophilus influenzae</i>	49247	<i>Streptococcus pneumoniae</i>	33938
<i>Haemophilus parainfluenzae</i>	33392-T	<i>Streptococcus pneumoniae</i>	49619
<i>Klebsiella oxytoca</i>	49131	<i>Streptococcus pneumoniae</i>	51937
<i>Klebsiella pneumoniae</i>	49472	<i>Streptococcus pneumoniae</i>	SSI-14
<i>Klebsiella pneumoniae</i> (ESBL prod and KPC pos)	Clinical isolate	<i>Streptococcus pneumoniae</i>	SSI-7F
<i>Kocuria kristinae</i>	BAA752	<i>Streptococcus pneumoniae</i>	51938
<i>Kytococcus chroeter</i>	13884	<i>Streptococcus pyogenes</i> , group A	12384
<i>Lactobacillus casei</i>	393	<i>Streptococcus salivarius</i>	13419
<i>Lactococcus garvieae</i>	49157	Yeast	ATCC#
<i>Leuconostoc mesenteroides</i>	10877	<i>Candida albicans</i>	60193
<i>Listeria monocytogenes</i> , serotype 4b	19115	<i>Candida glabrata</i>	66032
		<i>Candida tropicalis</i>	750

#### Interfering Substances:

The 20 potentially interfering substances listed below produced appropriate results in the BinaxNOW® PBP2a test.

Anti-Inflammatory Drugs	Test Concentration	Endogenous Blood Components	Test Concentration
Acetaminophen	1324 µmol/L	Hemoglobin	2 g/L
Acetylsalicylic acid	3.62 mmol/L	Triglyceride sera	37 mmol/L
Ibuprofen	2425 µmol/L	Conjugated bilirubin	342 µmol/L
Antibiotics	Test Concentration	Unconjugated bilirubin	342 µmol/L
Amoxicillin	206 µmol/L	γ-globulin	120g/L
Cephalexin	337 µmol/L	Anti-coagulant	Test Concentration
Chloramphenicol	155 µmol/L	Sodium Polyanetholesulfonate (SPS)	1%
Ciprofloxacin	30.2 µmol/L		
Erythromycin	81.6 µmol/L		
Gentamicin	21 µmol/L		
Tetracycline	34 µmol/L		
Sulfisoxazole	1.12 mmol/L		
Sulfamethoxazole	1.58 mmol/L		
Trimethoprim	138 µmol/L		
Vancomycin	69 µmol/L		

#### Analytical Sensitivity:

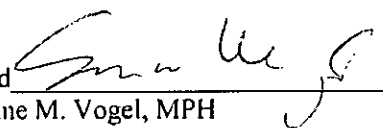
The analytical limit of detection of the BinaxNOW® PBP2a Test in ATCC strain BAA44 at a turbidity level of 0.03 is  $2.5 \times 10^7$  cells/mL, and the equivalent concentration in CFU/mL is  $2.36 \times 10^7$ .

Bacterial Concentration/mL	Number Detected	% Detection
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3.33x10 <sup>7</sup>	20/20	100
2.5x10 <sup>7</sup>	19/20	95
4.94x10 <sup>6</sup>	13/20	65
2.19x10 <sup>6</sup>	3/20	15
Whole Blood	0/20	0

**Reproducibility Study:**

A study of the BinaxNOW® PBP2a Test was conducted at 3 separate sites using panels of blind coded specimens containing negative and positive samples. Participants tested each sample twice on 5 different days. There was 100% (599/599) agreement with expected test results, with no significant differences within run (replicates tested by one operator), between run (5 different days), between sites (3 sites), or between operators (6 operators).

Signed   
 Suzanne M. Vogel, MPH  
 Clinical Affairs  
 Binax, Inc.

Date 4/12/10



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Mail Center-WO66-G609  
Silver Spring, MD 20993-0002

Binax, Inc  
c/o Ms. Suzanne Vogel  
Department of Clinical Affairs  
Inverness Medical  
10 Southgate Rd.  
Scarborough, Maine 04074

**APR 14 2010**

Re: K090301

Trade/Device Name: BinaxNOW® PBP2a Test  
Regulation Number: 21 CFR§ 866.1640  
Regulation Name: Methicillin Resistant *Staphylococcus aureus* (MRSA)  
Regulatory Class: Class II  
Product Code: MYI  
Dated: March 29, 2010  
Received: March 31, 2010

Dear Ms. Vogel:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into class II (Special Controls), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the Federal Register.



Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820). This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Parts 801 and 809), please contact the Office of *In Vitro* Diagnostic Device Evaluation and Safety at (301) 796-5450. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



Sally A. Hojvat, M.Sc., Ph.D.

Director

Division of Microbiology Devices

Office of *In Vitro* Diagnostic Device Evaluation and Safety  
Center for Devices and Radiological Health

Enclosure

## INDICATIONS FOR USE STATEMENT

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510(k) Number (if known): k090301

Device Name: BinaxNOW® PBP2a Test

### Indications for Use:

The BinaxNOW® PBP2a Test is a qualitative, *in vitro* immunochromatographic assay for the rapid detection of penicillin-binding protein 2a (PBP2a) present in methicillin-resistant *Staphylococcus aureus* (MRSA). The test is performed directly on blood culture samples positive for *S. aureus*.

The BinaxNOW® PBP2a Test is not intended to diagnose MRSA nor to guide or monitor treatment for MRSA infections. Subculturing positive blood cultures is necessary to recover organisms for susceptibility testing or epidemiological typing.

Prescription Use ☒  
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE- CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

  
Division Sign-Off

Binax NOW® PBP2a Test  
510(k) Notification k090301  
Rev. 3/29/10

Confidential

Office of In Vitro Diagnostic Device  
Evaluation and Safety

510(k) k090301